

Case No. 2:18-cv-02505-NIQA

1. Plaintiff agrees to reserve her questions on topic 1 during the September 14, 2021 deposition until the objections to the topic can be resolved;

2. The Parties agree that Plaintiff reserves her right to compel Defendants to produce a witness prepared to testify to topic 1 following the deposition pursuant to Rule 30(b)(6) on September 14, 2021; and

3. Defendants agree not to oppose Plaintiff's efforts to compel a witness to testify to topic 1 on procedural grounds such as, for example, the 30(b)(6) deposition having already taken place or Plaintiff having taken the number of depositions to which she is entitled under the Federal Rules of Civil Procedure.

For Plaintiff Anna K. Nupson

Dated: \_\_\_\_\_

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George Benjamin Davis, Esq.  
The Davis Kelin Law Firm, LLC

For Defendants Schnader Harrison Segal  
& Lewis LLP and Bruce A. Rosenfield, Esq.

Dated: \_\_\_\_\_

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Lawrence G. McMichael, Esq.  
DILWORTH PAXSON LLP